

September 8, 2008

Mr. Bunyak,

E. I. DuPont de Nemours, & Co. wishes to provide the following comments on the "Draft FLAG Phase I Report-- Revised" (73 FR (39039), July 8, 2008 Federal Land Managers' Air Quality Related Values Work Group). In general, we agree with most of the draft changes since they clarify some ambiguities which currently exist in FLAG 2000. The following are DuPont's comments:

With regard to the first-level analysis procedures (page 33 of the draft), who will determine which three years of mesoscale meteorological model output data to be used in the analysis, the FLM, the EPA, or the state or local reviewing agency? Also, how will the applicant acquire this data? Because of the large dataset sizes involved, experience with BART exemption modeling required sending an auxiliary hard drive to the State agency for them to copy the data, and return to us. Will this same procedure be employed for the FLAG first-level impact analysis? With regard to the deposition analysis thresholds (DAT), how will the applicant know they potentially exceed the DAT's without actually conducting a deposition modeling analysis? Or, will it be the FLM's "best judgement" as to whether an applicant has the potential for exceeding the DAT? This may introduce a new ambiguity in the FLAG process.

DuPont thanks you for the opportunity to provide comments regarding this draft report. If you should have any questions, please feel free to contact me via e-mail, or by telephone at the number below.

Sincerely,

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